

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 22-cr-348 (JNE/LIB)

United States of America,

Plaintiff,

vs.

**DEFENDANT’S MOTION TO
MODIFY CONDITIONS OF RELEASE**

Gale Allen Rachuy,

Defendant.

Defendant Gale Allen Rachuy, by and through his attorney, respectfully requests the Court modify the conditions of his release as follows:

1. To vacate the halfway house condition if Mr. Rachuy is not placed in a halfway house by 12:00 pm on January 2, 2023. On December 19, 2022, the Court ordered Mr. Rachuy to be released to a halfway house. As of this motion date, Mr. Rachuy remains incarcerated at the Douglas County jail in Wisconsin. Mr. Rachuy’s case did not trigger mandatory detention, but his continued incarceration amounts to just that.
2. That if halfway house placement is not available by January 2, 2023, at 12:00 pm, Mr. Rachuy be released from custody and placed on house arrest, monitored by Probation. Mr. Rachuy has several upcoming court hearings and medical appointments. While the Court authorized release from the halfway house to attend these obligations, the Court did not authorize release from custody for the same purpose. So long as Mr. Rachuy remains in custody, he cannot attend any state court proceedings or medical appointments.
3. Counsel conferred with AUSA Chelsea Walcker regarding this request. The Government opposes any modification to home detention/electronic home monitoring.

Dated: December 30, 2022

Respectfully submitted,

/s/ Christopher Keyser

Christopher Keyser (0389361)

400 South Fourth Street, Suite 806M

Minneapolis, MN 55415

Phone: (612) 338-5007

Fax: (612) 454-2775

Email: chris@keyserdefense.com

Attorney for Gale Allen Rachuy